

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JUDGE HIBLER

MAGISTRATE JUDGE MASON

UNITED STATES OF AMERICA

No. 11 CR 454

v.

Violations: Title 18, United States Code,  
Sections 656 and 2113(a).

NAVAHCIA EDWARDS

FILED

JUL 28 2011

COUNT ONE

The SPECIAL FEBRUARY 2011-2 GRAND JURY charges: MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

On or about May 29, 2011, at Palos Heights, in the Northern District of Illinois,  
Eastern Division,

NAVAHCIA EDWARDS,

defendant herein, did by force and violence, and by intimidation, take from the person and  
presence of bank employees approximately \$120,200 in United States Currency belonging  
to and in the care, custody, control, management, and possession of TCF Bank, 6410 West  
127th Street, Palos Heights, Illinois, the deposits of which were then insured by the Federal  
Deposit Insurance Corporation;

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT TWO**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 15, 2011, at Country Club Hills, in the Northern District of Illinois, Eastern Division,

NAVAHICIA EDWARDS,

defendant herein, being an employee of the Chase Bank, located at 4001 West 167th Street, Country Club Hills, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, with intent to injure and defraud such bank, did embezzle, abstract, purloin, and willfully misapply approximately \$2,900 belonging to and intrusted to the custody and care of such bank;

In violation of Title 18, United States Code, Section 656.

**COUNT THREE**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about April 23, 2011, at Country Club Hills, in the Northern District of Illinois,  
Eastern Division,

NAVAHCIA EDWARDS,

defendant herein, being an employee of the Chase Bank, located at 4001 West 167th Street,  
Country Club Hills, Illinois, the deposits of which were then insured by the Federal Deposit  
Insurance Corporation, with intent to injure and defraud such bank, did embezzle, abstract,  
purloin, and willfully misapply approximately \$19,502 belonging to and intrusted to the  
custody and care of such bank;

In violation of Title 18, United States Code, Section 656.

**FORFEITURE ALLEGATION**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

1. The allegations contained in Counts Two and Three of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2).

2. As a result of the violations of Title 18, United States Code, Section 656, as alleged in this Indictment,

NAVAHCIA EDWRDS,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section, 982(a)(2), any and all right, title and interest in property, real and personal, which constitutes and is derived from proceeds traceable to the charged offenses.

3. The interest of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section, 982(a)(2) includes but is not limited to approximately \$18,402 in United States Currency.

4. If any of the property subject to forfeiture and described above, as a result of any act or omission of the defendant:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the Court;
- (d) Has been substantially diminished in value; or

- (e) Has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:

---

FOREPERSON

---

UNITED STATES ATTORNEY